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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SARAH R. LONDON
IN SUPPORT OF PLAINTIFFS' PORTION
OF PTO 8 LETTER BRIEF REGARDING
REDACTIONS**

This Document Relates to:
All Cases

Judge: Honorable Lisa J. Cisneros

1 I, Sarah R. London, hereby declare as follows:

2 1. I am a partner of Lieff Cabraser Heimann & Bernstein, LLP, an attorney licensed
3 in the State of California and duly admitted to practice before this Court, and appointed co-lead
4 counsel in the above captioned action.

5 2. I submit this declaration in support of Plaintiffs' portion of the joint letter brief
6 concerning Uber's redactions of documents produced under PTO 5.

7 3. I have personal knowledge of the facts stated herein and, if called upon to do so,
8 could and would testify competently thereto.

9 4. As required by PTO 8, I attest that Plaintiffs met and conferred with Defendants to
10 obtain the sought-after discovery without court action.

11 5. Attached as **Exhibit A** is a true and correct copy of a document Uber produced
12 under PTO 5 with a bates stamp beginning UBER-MDL3084-000001290. Because Uber marked
13 this document Confidential, it has been filed under seal.

14 6. Attached as **Exhibit B** is a true and correct copy of a document Uber produced
15 under PTO 5 bates-stamped UBER-MDL3084-000048774. Because Uber marked this document
16 Highly Confidential, it has been filed under seal.

17 7. Attached as **Exhibit C** is a true and correct copy of a document Uber produced
18 under PTO 5 bates-stamped UBER-MDL3084-000033294. Because Uber marked this document
19 Highly Confidential, it has been filed under seal.

20 8. Attached as **Exhibit D** is a true and correct copy of a document Uber produced
21 under PTO 5 with a bates stamp beginning UBER-MDL3084-000032853. Because Uber marked
22 this document Highly Confidential, it has been filed under seal.

23 9. Attached as **Exhibit E** is a true and correct copy of a document Uber produced
24 under PTO 5 bates-stamped UBER-MDL3084-000034701. Because Uber marked this document
25 Highly Confidential, it has been filed under seal.

26 10. Attached as **Exhibit F** is a true and correct copy of a document Uber produced
27 under PTO 5 bates-stamped UBER-MDL3084-000004053. Because Uber marked this document
28 Highly Confidential, it has been filed under seal.

